

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

DINO BOUTERSE, and
EDMUND QUINCY MUNTSLAG,
a/k/a "Blue," :

Defendants. :

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USDC SDNY
DOCUMENT
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DATE FILED: **AUG 20 2013**

SEALED INDICTMENT

: S1 13 Cr. 635

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2011, up to and including in or about August 2013, in Suriname and elsewhere, DINO BOUTERSE and EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendants, who will be arrested and first brought to the Southern District of New York, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DINO BOUTERSE and EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendants, and others known and unknown, would and did import into the United States from a place outside thereof five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812,

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952(a), 960(a)(1), and 960(b)(1)(B) of Title 21, United States Code.

3. It was further a part and an object of the conspiracy that DINO BOUTERSE and EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, five kilograms and more of a mixture and substance containing a detectable amount of cocaine, intending and knowing that such substance would be imported into the United States from a place outside thereof, and into waters within a distance of 12 miles of the coast of the United States, in violation of Sections 812, 959(a), 960(a)(3) and 960(b)(1)(B) of Title 21, United States Code.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal objects thereof, DINO BOUTERSE and EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendants, and others known and unknown, committed the following overt acts:

a. On or about July 25, 2013, EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendant, traveled to an airport in Suriname in order to make arrangements for the transport of 10 kilograms of cocaine.

b. On or about July 27, 2013, DINO BOUTERSE, the defendant, caused a suitcase containing 10 kilograms of cocaine

to be transported from Suriname to the Caribbean on board a commercial flight.

(Title 21, United States Code, Section 963;
Title 18, United States Code, Section 3238)

COUNT TWO

The Grand Jury further charges:

5. From at least in or about December 2011, up to and including in or about August 2013, in an offense begun and completed outside the jurisdiction of any particular State or District of the United States, to wit, in Suriname and elsewhere, DINO BOUTERSE, the defendant, who will be arrested and first brought to the Southern District of New York, during and in relation to a drug-trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use, carry, and brandish a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, brandishing, and possession of firearms, including destructive devices, to wit, the defendant brandished firearms including a Light-Antitank Weapon, which is a launcher containing a rocket, and pistols.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii),
924(c)(1)(B)(ii), 3238, and 2)

FORFEITURE ALLEGATION

(As to Count One)

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, DINO BOUTERSE and EDMUND QUINCY MUNTSLAG, a/k/a "Blue," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds they obtained directly or indirectly as a result of said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Indictment.


Substitute Assets Provision


7. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 853 and 970.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SEALED INDICTMENT

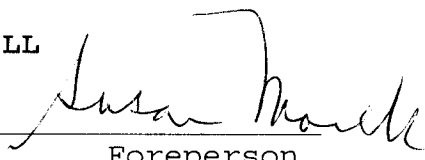
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(18 U.S.C. §§ 2, 924(c)(1)(A)(ii),
924(c)(1)(B)(ii); 21 U.S.C. § 963.)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.
